

LAW OFFICES OF
FREDERICK L. SOSINSKY

45 BROADWAY, SUITE 3010,
NEW YORK, NEW YORK 10006

TELEPHONE (212) 285-2270
TELECOPIER (212) 248-0999
EMAIL: Freds@newyork-criminaldefense.com

June 3, 2020

By ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Anthony Cheedie, et al.
19 Cr. 833 (SHS)

Dear Judge Stein:

As you are aware, I represent Anthony Cheedie, the defendant in the above matter. I am writing to respectfully request that the Court modify the conditions of Mr. Cheedie's release on bond so as to permit him to travel with his wife and young child to visit and stay at the home of his mother-in-law Rekha Chugh in Sharon, Massachusetts. Mr. Cheedie asks that he be permitted to stay with Ms. Chugh from this Saturday, June 6 through and including Sunday, June 21, 2020, when he will return to his residence in New Jersey.

As a consequence of COVID 19 travel restrictions, Mr. Cheedie's wife Nisha (as well as Mr. Cheedie and their eight month old son) has until now been unable to see her mother, a recent widow, for more than three months. Due to her age and medical condition, Rekha Chugh has not left her home during these many months and now needs assistance and comfort. Nisha Chugh has been working remotely for her employer, Barclays Capital, since her return from maternity leave and would continue to work remotely on a full-time basis from her mother's home. Mr. Cheedie's employer, Toyota Universe, has advised him that they do not anticipate his return to work until at least mid-July.

Mr. Cheedie has provided an itinerary to his Pretrial Services Officer Mohammed Ahmed, who has no objection to this application. AUSA Robert Sobelman has indicated that the Government also has no objection to our application.

Thank you very much for your consideration.

Respectfully submitted,

/s/

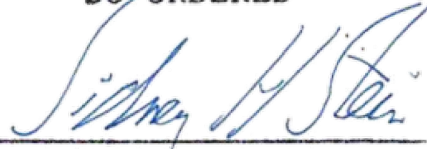
Frederick L. Sosinsky

FLS:bms

cc: PTSO Mohammed Ahmed (via email)

Application granted.

**Dated: New York, New York
June 3, 2020**

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.